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September 14, 2012

Hon. A. Kathleen Tomlinson
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: Precious Stephens v. Bayview Nursing Home & 199 SEIU
Civil Action No. Cv-07-0596 (JFB)(AKT)

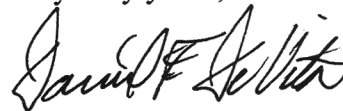
Dear Judge Tomlinson:

Pursuant to the Court's Order dated September 4, 2012, this letter is submitted to provide estimates of the costs of the telephone deposition of plaintiff in Jamaica. Attached hereto are the estimates of TSG reporting, which has worked closely with me to keep costs down and has arranged the room in Jamaica. The conference room in Jamaica will be \$175 per day. The remaining associated costs are the expected reporter fees and telephone fees. I have also attached the reporting company's price list, which as the Court can see contains a "preferred rate."

To also help keep costs down, all counsel have agreed to allow the oath to be administered in New York and to allow testimony to be recorded by the reporter in New York. I have volunteered my office conference room for the deposition. My telephone service provider, Optimum Lightpath, charges approximately 40 cents per minute for calls to Jamaica, which equates to approximately \$168 per 7 hour day.

The only variables are the number of pages of the transcript for each day, the number of days, and the number of pages of exhibits. Given the variables and the fixed costs, I estimate the telephonic deposition to cost approximately \$1500 per day. The attorneys previously estimated the deposition to take 2 to 3 days. The parties have set aside the following dates for the deposition: October 16, 17, 24, 25, and 30, 2012.

Very truly yours,



Daniel F. De Vita (DD 9065)

encl.

cc: W. Matthew Groh, Esq.
David Slutsky, Esq.

Daniel DeVita

From: Erica Weiss <Eweiss@tsgreporting.com>
Sent: Monday, September 10, 2012 3:17 PM
To: 'Daniel DeVita'
Subject: RE: RE: Erica from TSG Reporting - Stephens v. 1199SEIU

Hi Dan,

Below is a rough estimate of a full-day deposition including the conference room in Jamaica. We have assumed approximately seven hours on the record, regular delivery of the transcript, 50 pages of exhibits and one additional copy sold to opposing counsel. Of course, this total will change depending on the actual number of pages written, the number of pages of exhibits and if you require any additional services – rough draft, expedited delivery of the final transcript or LiveNote. Those costs are all set forth on the rate sheet sent to you earlier.

DESCRIPTION	# PAGES / QTY	UNIT PRICE	AMOUNT
Original & 1 Certified Transcript	210	\$4.25	\$892.50
Reporter Appearance Fee / Session	2	\$45.00	\$90.00
Compressed / ASCII / Word Index - Complimentary	1	\$45.00	\$0.00
Exhibits - Hard, Scanned & Hyperlinked	50	\$0.40	\$20.00
File Creation Fee - Hyperlinked Exhibits - Complimentary	1	\$50.00	\$0.00
Certified Transcript Sold Discount (1)	210	-\$0.50	-\$105.00
Conference Room (per day)	1	\$175.00	\$175.00
		TOTAL	\$1,072.50

Let us know if/when you are ready to schedule so that we can make sure we have you covered. Let us know if you need anything else.

Best,

Erica Sternin Weiss Esq.
Senior Account Executive

TSG Reporting, Inc.
Nationwide - Worldwide
Corporate Headquarters
747 Third Avenue, 10th Floor
New York, NY 10017
Phone: (877) 702-9580
Cell: (917) 653-3751
Fax: (212) 207-3311
eweiss@tsgreporting.com
Secure, online scheduling available at www.tsgreporting.com

For any information that is immediate in nature, please call our 24 Hour Client Service department for immediate assistance at the phone number above



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Daniel De Vita Esq. Preferred Rate Sheet – New York, NY*

TRANSCRIPT	Email / Electronic Delivery – All Transcripts	Complimentary
	Original & 1 Copy (8-10 business days)	\$4.25 / Page
	Certified Copy Discount	\$0.50 / Page / Copy Sold
	Immediate Delivery	\$4.25 / Page Additional
	Next Day Delivery	\$3.50 / Page Additional
	2 Day Delivery	\$2.75 / Page Additional
	3-5 Day Delivery	\$2.00 / Page Additional
	Interactive Real-time (aka LiveNote)	\$1.50 / Page Additional
	Internet Real-time – Transcription	\$1.50 / Page Additional
	Internet Real-time – Set Up / Connectivity Fee	\$100 / User
EXHIBITS	Rough ASCII Diskette	\$1.50 / Page Additional
	Reporter Appearance Fee (Sessions: 9am-1pm, 1pm-6pm)	\$45 / Session
	Reporter Appearance Fee – Videotaped	\$25 Additional / Session
	Minuscrite / ASCII / Word Index	Complimentary
	Exhibits (hard copy)	\$0.25 / Page
	Exhibits (scanned on CD-ROM)	\$0.25 / Page
	Exhibits (hard copy & scanned)	\$0.40 / Page
	Exhibit Linking (exhibits <u>hyperlinked</u> within transcript)	Complimentary
	Exhibits – OCR Processing	\$0.30 / Page Additional
VIDEO	Videographers (includes 1 copy in any format requested: MPEG, DVD, VHS)	\$325 / 1st 2 Hours \$100 / Each Additional Hour
	VideoSync (synching video with transcript)	\$125 / Tape
	Streaming Video – LiveNote Stream Fee	\$100 / User
	Streaming Video Server – Shipping to Location	At Cost
	Streaming Video & Text	\$150 / User
REPOSITORY	Online Repository – Transcript & Exhibits	Complimentary
	Online Repository – Video	\$0.25 / MB / Month
MISC.	Conference Rooms	Complimentary if Available
	24-Hour Live Client Service – Worldwide	Complimentary

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Daniel De Vita Esq. Preferred Rate Sheet – Kingston, Jamaica*

TRANSCRIPT	Email / Electronic Delivery – All Transcripts	Complimentary
	Original & 1 Copy (8-10 business days, 150 page minimum)	\$4.25 / Page
	Certified Copy Discount	\$0.50 / Page / Copy Sold
	Immediate Delivery	\$4.25 / Page Additional
	Next Day Delivery	\$3.50 / Page Additional
	2 Day Delivery	\$2.75 / Page Additional
	3-5 Day Delivery	\$2.00 / Page Additional
	Interactive Real-time (aka LiveNote)	\$1.50 / Page Additional
	Internet Real-time – Transcription	\$1.50 / Page Additional
	Internet Real-time – Set Up / Connectivity Fee	\$100 / User
EXHIBITS	Rough ASCII Diskette	\$1.50 / Page Additional
	Reporter Appearance Fee (Sessions: 9am-1pm, 1pm-6pm)	\$45 / Session
	Reporter Appearance Fee – Videotaped	\$25 Additional / Session
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	Exhibits (hard copy)	\$0.25 / Page
	Exhibits (scanned on CD-ROM)	\$0.25 / Page
	Exhibits (hard copy & scanned)	\$0.40 / Page
	Exhibit Linking (exhibits <u>hyperlinked</u> within transcript)	Complimentary
	Exhibits – OCR Processing	\$0.30 / Page Additional
VIDEO	Videographers (includes 1 copy in any format requested: MPEG, DVD, VHS)	\$1000 / Day
	VideoSync (synching video with transcript)	\$125 / Tape
	Streaming Video – LiveNote Stream Fee	\$100 / User
	Streaming Video Server – Shipping to Location	At Cost
	Streaming Video & Text	\$150 / User
REPOSITORY	Online Repository – Transcript & Exhibits	Complimentary
	Online Repository – Video	\$0.25 / MB / Month
MISC.	Conference Rooms	Complimentary if Available
	24-Hour Live Client Service – Worldwide	Complimentary
	Travel & Lodging	At Cost
	Travel Days	\$500 / Day

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